

# Google Exhibit B

**From:** [Yetter, Paul](#)  
**To:** [Zeke DeRose](#)  
**Cc:** [Ashley Keller](#); [Warren Postman](#); [Callahan, Bryce](#); [Chee, Heaven](#); [Eric Mahr](#)  
**Subject:** RE: Texas et al. v. Google LLC; re: Digital Privacy  
**Date:** Wednesday, February 3, 2021 4:24:52 PM  
**Attachments:** [image002.png](#)

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Zeke:

As you should know, Google is deeply committed to digital privacy for consumers of our products and services and has long been leader in this area.

Google simply does not engage in the practices that your note describes. Nor does your note provide any factual basis or legitimate reason for the demand that the State of Texas is making. It also is ironic, to put it mildly, that Texas alone is making such an unsupported demand now, given the breaches of court-ordered confidentiality regarding the draft Texas lawsuit which was leaked to the media and about which Texas is all but refusing to help investigate, remedy, and prevent from happening again.

Unless the State of Texas can provide a credible, factual, Rule 11 basis for its demand, we can only assume that the demand is being made for PR, harassing, or other illegitimate purposes.

Regards,

**R. Paul Yetter | Partner | Yetter Coleman LLP**  
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**From:** Zeke DeRose <[Zeke.DeRose@LanierLawFirm.com](mailto:Zeke.DeRose@LanierLawFirm.com)>  
**Sent:** Thursday, January 28, 2021 6:38 PM  
**To:** Yetter, Paul <[pyetter@yettercoleman.com](mailto:pyetter@yettercoleman.com)>; Callahan, Bryce <[bcallahan@yettercoleman.com](mailto:bcallahan@yettercoleman.com)>; Chee, Heaven <[hchee@yettercoleman.com](mailto:hchee@yettercoleman.com)>; Eric Mahr <[eric.mahr@freshfields.com](mailto:eric.mahr@freshfields.com)>  
**Cc:** Ashley Keller <[ack@kellerlenkner.com](mailto:ack@kellerlenkner.com)>; Warren Postman <[wdp@kellerlenkner.com](mailto:wdp@kellerlenkner.com)>  
**Subject:** Texas et al. v. Google LLC; re: Digital Privacy

Paul,

I write regarding data collection and digital privacy concerns of the representatives and agents of the State of Texas.

On behalf of the State of Texas, we request a written commitment from Google that Google, its parent company, affiliates and partners agree not to wiretap, mine, gather, scan, access, or review emails, texts, data or documents, from any and all Google platforms, including but not limited to its search engine, products and apps, of employees, representatives and agents of the following: Texas Office of the Attorney General; law firms retained by the State of Texas in the instant lawsuit, the Lanier Law Firm and Keller

Lenkner; expert consultants and/or expert witnesses retained to assist the State of Texas in the instant lawsuit; and any other employees, representatives, or agents of the State of Texas related to this litigation.

Given Google's purported data collection and access to, among other things, email, texts, data and documents on Google platforms (e.g., Gmail, Android texts, Android devices, Chrome, Google Drive, Google Docs, Google Sheets, Google Calendar, Google Meet, Maps App, etc.), such confirmation is integral to securing and protecting not only personal and private information, but also confidential information such as attorney-client communications and attorney work product.

Please confirm Google's commitment to the above request by 5:00pm Central time on February 2, 2021.

With much appreciation,

Zeke DeRose III



**Zeke DeRose**  
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